Chapter I: Purpose and Need

Introduction

For many generations, the Yosemite Lodge area has been a favored place for park visitors to spend the night in Yosemite Valley and to enjoy the majestic beauty of Yosemite Falls, the most highly visited natural feature in Yosemite National Park. In accordance with the General Management Plan (NPS 1980) and Final Yosemite Valley Plan and its Supplemental Environmental Impact Statement (referred to hereafter as the Yosemite Valley Plan) (NPS 2000a), the National Park Service is undertaking a comprehensive redevelopment of the Yosemite Lodge area, including redevelopment of Yosemite Lodge, redesign of Camp 4 walk-in campground, and relocation of Northside Drive. The National Park Service, in coordination with the American Indian Council of Mariposa County (aka Southern Sierra Miwuk Nation), is also undertaking the development of an Indian Cultural Center. The Yosemite Valley Plan identified and analyzed these projects at a programmatic level, with the exception of the Indian Cultural Center, which was analyzed as a cumulative project. However, as identified in the Yosemite Valley Plan, as individual actions from the Yosemite Valley Plan are implemented, the National Park Service would need to complete additional National Environmental Policy Act compliance tiered from the Yosemite Valley *Plan.* This environmental assessment is tiered from the *Yosemite Valley Plan* and analyzes the environmental impacts of the Yosemite Lodge Area Redevelopment at a site-specific level of detail.

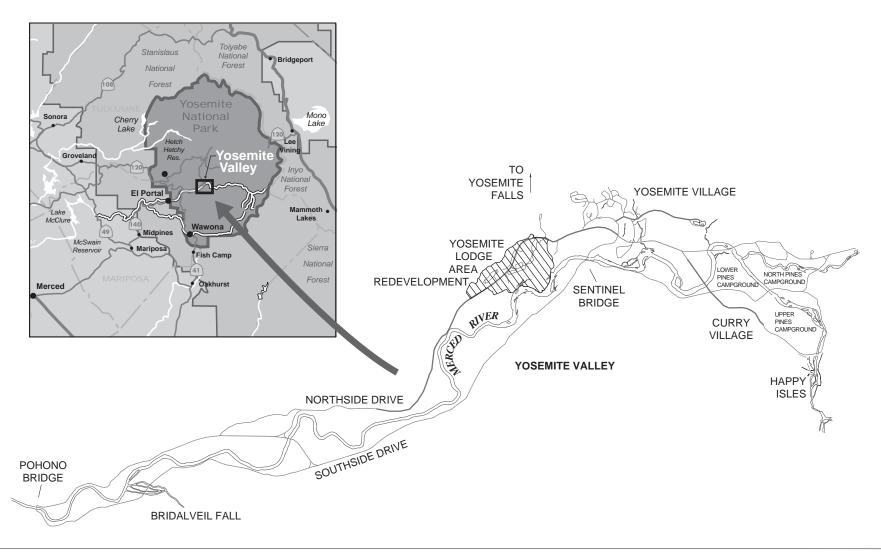
Yosemite Lodge

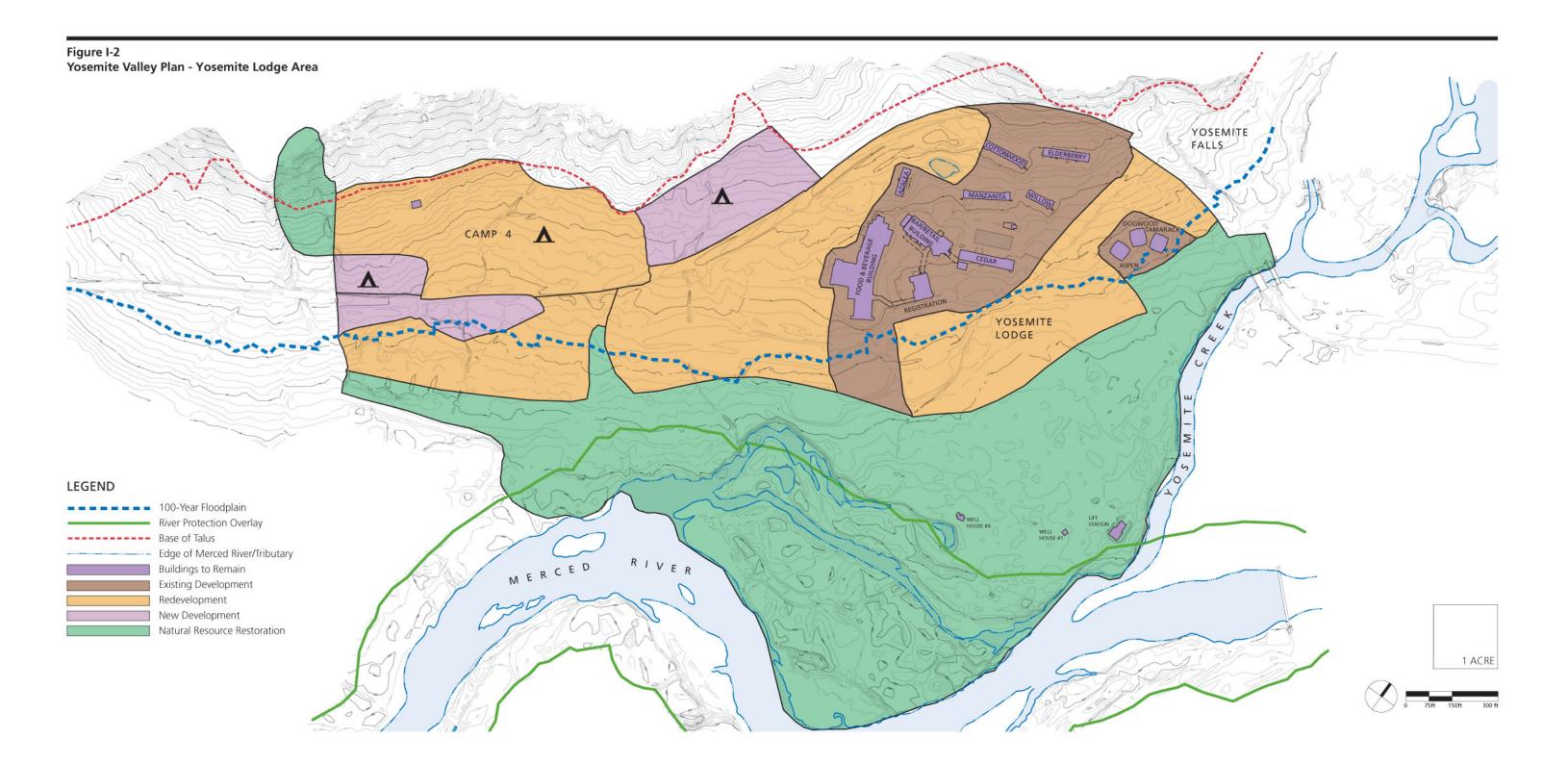
Redevelopment of the Yosemite Lodge area in Yosemite Valley (see figure I-1) has been a priority for the National Park Service for many years. The January 1997 flood destroyed or damaged approximately half of the lodging units at Yosemite Lodge. Subsequently, the National Park Service developed the Draft Yosemite Lodge Development Concept Plan Environmental Assessment to remove flood-damaged lodging and construct new lodging outside the floodplain. Other individual planning efforts, including plans for housing, restoration of areas to natural conditions to the extent practicable, transportation, and visitor services, were also accelerated by necessity following the January 1997 flood in the park. Through both extensive public comment and litigation, questions were raised about the appropriateness of pursuing separate yet connected planning efforts in Yosemite Valley. As a result, the National Park Service combined four distinct planning projects (including the Yosemite Lodge Development Concept Plan) together into one comprehensive planning effort for Yosemite Valley—the Yosemite Valley Plan. Figure I-2 shows the planning areas established for the Yosemite Lodge area in the Yosemite Valley Plan.

The January 1997 flood destroyed or damaged approximately half of the lodging units at Yosemite Lodge.



Figure I-1 Project Location





Northside Drive and Camp 4

The *Yosemite Valley Plan* identified that Northside Drive in the Yosemite Lodge and Camp 4 area be relocated south of the Lodge complex to reduce conflicts between vehicles and pedestrians and to provide safer pedestrian access between the Lodge and the Lower Yosemite Fall area. At Camp 4, the *Yosemite Valley Plan* called for the expansion and improvement of the campground as part of an effort to relocate campgrounds outside of highly valued natural resource areas, the Merced River floodplain, and rockfall zones.

The *Yosemite Valley Plan* also identified the removal of the five sites west of the intermittent creek at the western end of Camp 4 to provide a buffer for the new Indian Cultural Center.

Indian Cultural Center

The *General Management Plan* identified the need to establish an Indian Cultural Center at the site of the last historically occupied Indian village in Yosemite Valley. In accordance with the *General Management Plan* and a 1997 agreement, the National Park Service, in coordination with the American Indian Council of Mariposa County, is undertaking the planning, design, and compliance necessary to develop the Indian Cultural Center. The American Indian Cultural Center and for conducting cultural and educational activities.

The National Park Service originally planned to develop an independent environmental compliance document for the Indian Cultural Center, since this undertaking has been considered a separate project. However, substantial progress had been made on the design of the Indian Cultural Center by September 2002, which brought the project's environmental compliance schedule into alignment with the compliance schedule for Yosemite Lodge, Camp 4, and the relocation of Northside Drive. At that time, the National Park Service decided to include the Indian Cultural Center in the *Yosemite Lodge Area Redevelopment Environmental Assessment* due to the physical proximity of the projects and their similar compliance schedules.

Purpose of the Action

The purpose of the Yosemite Lodge Area Redevelopment is to implement the actions called for in the *General Management Plan* and *Yosemite Valley Plan*¹ for the Yosemite Lodge area. Actions called for in the *Yosemite Valley Plan* were guided by the goals of 1980 *General Management Plan* and the 2001 *Merced Wild and Scenic River Comprehensive Management Plan* (Merced River Plan). The specific purposes of the Yosemite Lodge Area Redevelopment reflect the purposes of the *Yosemite Valley Plan* (see *Final Yosemite Valley Plan/Supplemental Environmental Impact Statement*, Volume IA, Chapter 1, page 1-5) within Yosemite Valley to:

- Restore, protect, and enhance the resources of Yosemite Valley by:
 - Improving connections between Yosemite Lodge and the natural resources of Yosemite Valley, including enhancing connections between interior spaces and the outdoors

As approved by the Final Yosemite Valley Plan/SEIS Record of Decision and as presented and analyzed in the Final Yosemite Valley Plan/SEIS, Alternative 2.

- Siting lodging and camping facilities outside of the 100-year floodplain, River Protection Overlay, and rockfall zone
- Designing Camp 4 campsites to fit within the natural landscape
- Providing a traditional tribal presence for the American Indian Council of Mariposa County (aka Southern Sierra Miwuk Nation) to continue their traditions in Yosemite Valley and to enhance the meaning and sacred nature of Yosemite, as identified in the General Management Plan
- Provide opportunities for high-quality, resource-based visitor experiences by:
 - Changing the character of Yosemite Lodge from a motel-type experience to one more connected to a national park lodge experience and Yosemite Valley
 - Providing more economy lodging and campsites in Yosemite Valley
 - Expanding camping opportunities in Yosemite Valley
 - Improving wayfinding on the project site, including to the Yosemite Falls trailhead
- Reduce traffic congestion by:
 - Improving the vehicle and pedestrian interface between Yosemite Lodge and the Lower Yosemite Fall area
- Provide effective park operations to meet the mission of the National Park Service by:
 - Improving existing maintenance and common facilities and utilities at Yosemite Lodge and Camp 4
 - Providing adequate parking for Yosemite Lodge and Camp 4 guests consistent with the Yosemite Valley Plan

Need for the Action

The need for the Yosemite Lodge Area Redevelopment parallels the need for the Yosemite Valley Plan (see Final Yosemite Valley Plan/SEIS, Volume IA, Chapter 1, page 1-6) to provide improved facilities and services for people who visit Yosemite Valley. Improved facilities and services are needed to:

- Replace some of the overnight accommodations at Yosemite Lodge that were lost during the 1997 flood and remove some lodging units that remain within the 100-year floodplain
- Replace some of the campsites in Yosemite Valley that were lost in the 1997 flood
- Provide a national park lodge experience at Yosemite Lodge instead of the existing moteltype experience
- Reduce traffic congestion on Northside Drive in the vicinity of Yosemite Lodge and Yosemite Falls and improve safety for pedestrians and bicyclists crossing Northside Drive between the Lodge and the Lower Yosemite Fall area
- Provide for a traditional tribal presence in Yosemite Valley

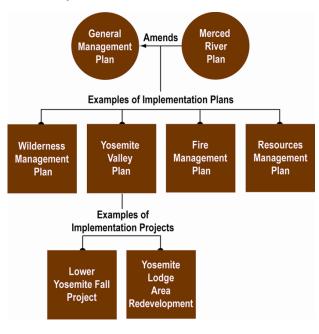
Regulations, Policies, and Management Goals

This environmental assessment is written with the guidance of a set of regulations and policies. The project must comply with requirements of the National Environmental Policy Act, National Historic Preservation Act, and Wild and Scenic Rivers Act as well as other legislation that governs land use, natural resource protection, and other policy issues within Yosemite National Park (see Appendix A, Applicable Legislation and Policies).

A brief overview is provided below of planning documents, regulations and polices, management goals, and issues and concerns that relate to the development of this environmental assessment and form the context under which the Yosemite Lodge Area Redevelopment would be implemented. The relationship of this environmental assessment to other Yosemite National Park plans is shown in figure 1-3.

Planning in Yosemite National Park takes two different forms: general management planning and implementation planning. General management plans are required for national parks by the National Park and Recreation Act of 1978. The purpose of a general management plan is to set a "clearly defined direction for resource"

Figure 1-3
Relationship to Yosemite National Park Plans



preservation and visitor use" (NPS 1998a) and provide general directions and policies to guide planning and management in the park. The *General Management Plan* is the overall planning document for Yosemite National Park.

The Merced River Plan is a planning document with weight equal to that of the *General Management Plan*. In designating the Merced River as a Wild and Scenic River, Congress directed the National Park Service to prepare its management plan for the river by making appropriate revisions to the park's *General Management Plan* (16 United States Code [USC] 1274[a][62]). River management plans must also be coordinated with plans for adjacent federal lands (16 USC, Section 1283). The Merced River Plan provides a framework for decision-making on future management actions within the Merced Wild and Scenic River corridor.

Implementation plans, which tier off the *General Management Plan* and the Merced River Plan (if appropriate, given the project's location), focus on "how to implement an activity or project needed to achieve a long-term goal" (NPS 2001c). Implementation plans may direct specific projects as well as ongoing management activities or programs and provide a more extensive level of detail and analysis.

The Yosemite Valley Plan is an example of an implementation plan that outlines specific actions that will enable the National Park Service to meet the broad goals of the General Management Plan for Yosemite Valley and modifies other provisions based on more current information. Because of changes proposed by Yosemite Valley planning efforts to the General Management Plan (guided by information developed since 1980), the National Park Service prepared the Yosemite Valley Plan to amend the General Management Plan for Yosemite Valley.

The components of the Yosemite Lodge Area Redevelopment were identified and analyzed in the *Yosemite Valley Plan* at a programmatic level of detail, with the exception of the Indian Cultural Center, which was analyzed as a cumulative project in the *Yosemite Valley Plan*. This environmental assessment is tiered from the *Yosemite Valley Plan* and analyzes the Yosemite Lodge Area Redevelopment at a site-specific level of detail, supplementing the analysis of the *Yosemite Valley Plan* and the Merced River Plan.

National Park Service Organic Act

In 1916, the National Park Service Organic Act established the National Park Service to "promote and regulate the use of the Federal areas known as national parks, monuments, and reservations . . ." and defined the purpose of the national parks as "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." This law, along with its amendments and other national park legislation, provides overall guidance for the management of Yosemite National Park.

The Prohibition on Impairment of Park Resources and Values

The Organic Act establishes the management responsibilities of the National Park Service. While Congress has given the National Park Service management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that park resources and values be left unimpaired, unless a particular law directly and specifically provides otherwise. This cornerstone of the Organic Act establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the general public to have present and future opportunities for enjoyment of them. The National Park Service *Management Policies 2001* (NPS 2000c) provides guidance on addressing impairment.

Management Goals and Criteria

Management goals identify the long-range direction for Yosemite National Park. Any proposed project must carefully balance multiple goals, especially in a park as large and varied as Yosemite National Park. The *General Management Plan* for Yosemite National Park sets forth the following five broad goals for management of the park as a whole:

- Reclaim priceless natural beauty
- Allow natural processes to prevail
- Promote visitor understanding and enjoyment
- Markedly reduce traffic congestion
- Reduce crowding

The Merced River Plan works in concert with the goals set forth in the General Management Plan. It also outlines an additional set of specific goals for management of the Merced Wild and Scenic River. The Merced River Plan's five goals, listed below, were developed to further the policy established by the Wild and Scenic Rivers Act, namely to preserve designated rivers in their freeflowing condition and protect and enhance the river's Outstandingly Remarkable Values. (A description of Outstandingly Remarkable Values is provided in Chapter V, Merced Wild and Scenic River, of this environmental assessment and on page 40 of the Merced River Plan.)

- Protect and enhance river-related natural resources
- Protect and restore natural hydrological and geomorphic processes
- Protect and enhance river-related cultural resources
- Provide diverse river-related recreational and educational experiences
- Provide appropriate land uses

The Yosemite Valley Plan carries forward the goals of the General Management Plan and the Merced River Plan. The criteria listed below provide guidance for accomplishing these goals in Yosemite Valley.

- Protect highly valued natural and cultural resources (see the Final Yosemite Valley Plan/SEIS, Vol. Ia, Chapter 2, page II-9 for a discussion of highly valued resources)
- Remove unnecessary facilities from and locate new facilities outside of highly valued resource areas unless there is no feasible alternative
- Place new facilities in such a way as to avoid or minimize disruption of natural processes
- Apply criteria from the Merced River Plan for areas affected by actions approved in the Yosemite Valley Plan in Yosemite Valley (see Final Yosemite Valley Plan/SEIS, Vol. Ia, Chapter 1, page I-12)

Public Involvement

The National Park Service conducted an extensive public scoping process for the Yosemite Lodge Area Redevelopment. The Yosemite National Park newsletter, Planning Update, provided information to the public on the plans for the Yosemite Lodge Area Redevelopment and project status (NPS 2002i; NPS 2003c). The National Park Service held a series of informal public meetings on the Yosemite Lodge Area Redevelopment and other upcoming park projects. Public meetings were held approximately monthly from June 2002 through August 2003. A letter from the park superintendent in September 2002 announced the public scoping period for the Yosemite Lodge Area Redevelopment and the decision to include the planning and compliance for the Indian Cultural Center in the environmental assessment. The National Park Service conducted a formal public scoping period from September 19, 2002 through October 26, 2002, including a one-day public scoping meeting at Yosemite Lodge on October 23, 2002.

A total of 266 letters, including emails, faxes, comment forms, and U.S. mail, were received. From these letters, 438 public comments were extracted, and from the comments, 187 concern statements were generated and reviewed by the National Park Service.

Issues Addressed in the Environmental Assessment

Issues and concerns raised by the public that are addressed in the Yosemite Lodge Area Redevelopment Environmental Assessment include:

- Project Implementation. The National Park Service should implement the Yosemite Lodge Area Redevelopment because it conforms with other Yosemite National Park plans.
- Resource Protection. The National Park Service should develop alternatives that preserve or enhance the natural ecosystems of Yosemite Valley and protect park resources from commercialization. In addition, all park facilities should be removed from the Merced River Protection Overlay and floodplain. Confine construction to previously disturbed ground.
- Public Involvement. The National Park Service should provide detailed information on the Yosemite Lodge Area Redevelopment to allow for meaningful public comment and seek input from diverse individuals and groups.
- Compliance. It is important that any implementation project comply with the National Environmental Policy Act, the Yosemite Valley Plan, the Merced River Plan, and all other relevant regulatory requirements, including consultation with associated American Indian groups and Section 106 of the National Historic Preservation Act.
- Visitor Services. The National Park Service should consider the effects of increased visitor capacity on providing quality service to park visitors.
- Lodging. Adequate lodging should be provided in Yosemite Valley. Affordable lodging opportunities should be provided in Yosemite Valley, as well as a fair division of accommodations in different price ranges.
- Lodge Parking. Some commenters requested that parking at Yosemite Lodge be placed as close to each facility as possible. Other commenters supported more remote parking locations to promote a pedestrian experience at the Lodge.
- Integrate Lodging with Natural Setting. Yosemite Lodge buildings should be integrated with the surrounding natural aesthetics.
- Lodge Experience. Define what is meant by the "lodge experience" in the Yosemite Lodge Area Redevelopment, as opposed to a motel-type experience.
- Lodge Upgrade. Consider leaving Yosemite Lodge as it is, and do not redevelop Yosemite Lodge.
- Campsites. The National Park Service should increase the number of campsites in the park, including walk-in campsites and campsites available to families. Campsites should be designed to provide a more primitive camp setting and retain the rustic, simple character of Camp 4. The historic and social importance of Camp 4 to the climbing community should be acknowledged, as well as the importance of Camp 4 for low-income visitors.
- Camp 4 Facilities. Improved bathroom, cooking, and other common facilities should be provided at Camp 4. Adequate bear-proof food storage and gear storage lockers should be provided. Tent cabins should be provided for search and rescue volunteers. The character and social functions of the Camp 4 parking lot should be retained. A historical marker should be placed at the entrance to Camp 4.
- Camp 4 Upgrade. The National Park Service should not upgrade the campground facilities at Camp 4.
- *Rockfall Zone.* Campsites should not be expanded into the rockfall zone.

- Museum. The National Park Service should create a museum to house climbing exhibits and Yosemite Indian cultural history.
- Transportation System. The National Park Service should evaluate the transportation system impacts associated with relocating Northside Drive, as well as the public safety and resource protection issues associated with this project component.
- Northside Drive Reroute. Northside Drive should be rerouted to enhance visitor experience. Northside Drive should be relocated through disturbed areas and over existing parking lots to avoid disturbing natural and cultural resources.
- Sustainable Development. The principles of sustainable development should be incorporated into new facilities.

Issues Not Addressed in the Environmental Assessment

The following issues are not addressed directly in the Yosemite Lodge Area Redevelopment Environmental Assessment for one of three reasons: (1) the issue is addressed by other plans, either completed or in progress; (2) the issue is inconsistent with National Park Service management guidance; or (3) the issue is beyond the scope of the project.

Replace Lodging Lost During 1997 Flood

Public comment indicated that the National Park Service should replace the Yosemite Lodge units that were lost in the 1997 flood. The decision to provide a total of 251 lodging units at Yosemite Lodge was analyzed in the *Final Yosemite Valley Plan/SEIS*. With increasingly available transportation and the development of recreation, lodging, and camping facilities in gateway communities, visitors are no longer dependent on overnight accommodations (camping and lodging) within Yosemite Valley during a visit to Yosemite National Park. Nonetheless, the National Park Service recognizes that there is great value in being able to experience the Valley during the evening, night, and early morning, and overnight accommodations facilitate this special experience for park visitors. Determining the appropriate amount and types of overnight accommodations needed to provide a quality visitor experience remains a challenging issue.

Target numbers of lodging units were established through a public process conducted for the General Management Plan. The number of lodging units was further refined in the 1992 Concession Services Plan. The Yosemite Valley Plan calls for an additional six lodging units in an effort to improve the quality of visitor experiences while protecting and preserving resources for future generations. Decisions on the number and type of visitor accommodations were based on resource and site conditions. These conditions include floodplains and geological hazard areas (see Yosemite Valley Plan, Volume IA, Chapter 2, Alternatives, Developing a Range of Alternatives – Development Considerations), as well as the quality of the overnight experience.

Remove Yosemite Lodge

Public comments suggested that the National Park Service remove Yosemite Lodge from the park or consider replacing Yosemite Lodge rooms with low-cost camping facilities. This comment is not consistent with the National Park Service's park management guidance, including the direction for Yosemite Lodge provided in both the General Management Plan and the Yosemite Valley Plan.

Make Economical Improvements to Lodge Buildings Instead of Constructing New **Buildings**

Public comment indicated that the National Park Service should make economical improvements to existing structures instead of constructing new buildings. Consistent with the Yosemite Valley *Plan*, the National Park Service is removing Yosemite Lodge buildings (such as Alder, Maple, Hemlock, and Juniper) located in the Merced River 100-year floodplain and is replacing the lodging units outside of the 100-year floodplain.

Provide a Multi-purpose Climber's Lounge

The public suggested the development of a multi-purpose lounge at Yosemite Lodge to display items of historical interest from Yosemite's rich climbing history and to provide a reading room, game room, lecture room, and an inclement weather refuge, as well as an area to find climbing partners and trade information. Consistent with the Yosemite Valley Plan, the National Park Service proposes to redesign the Mountain Room Bar into a public lobby and lounge space. This lobby and lounge space would be provided for Yosemite Lodge guests and other Yosemite visitors and would not be specifically designated for Camp 4 patrons. In one of the alternatives, the National Park Service proposes the development of a sheltered cooking pavilion at Camp 4 to provide many functions, including shelter from inclement weather at the campground.

Do Not Relocate Northside Drive

Public comment indicated that the National Park Service should specify the decision criteria used to relocate Northside Drive inside the Merced River floodplain and reconsider the decision to relocate Northside Drive. The decision to relocate Northside Drive was presented and analyzed in the Yosemite Valley Plan. As stated in the Yosemite Valley Plan, Northside Drive is being realigned for several reasons: to eliminate the physical barrier between Yosemite Lodge and Lower Yosemite Fall, to eliminate conflicts between pedestrians and vehicles at the Lodge/Falls intersection, to help in changing the character of Yosemite Lodge from one dominated by cars and parking to one that is pedestrian-friendly, and to provide more efficient circulation and parking in the Yosemite Lodge and Camp 4 area. The new road alignment would be located away from the Merced River and would be designed to preserve existing highly valued resources, including oak woodland communities. Areas currently affected by development between the new road and the Merced River would be restored to natural conditions to the extent practicable.

Terminate Northside Drive

The Yosemite Valley Plan called for the termination of Northside Drive at Yosemite Lodge after adoption of the traveler information and traffic management system for Yosemite National Park. The National Park Service considered including the termination of Northside Drive as part of the Yosemite Lodge Area Redevelopment, but subsequently determined that the associated transportation issues were sufficiently complicated that the termination of Northside Drive should be included as part of the traveler information and traffic management system planning effort.

Do Not Construct New Vehicle Bridge Over Yosemite Creek

In planning to realign Northside Drive south of the Yosemite Lodge site, the National Park Service planned to build a new vehicular bridge across Yosemite Creek to allow safe realignment of Northside Drive consistent with the actions called for in the Yosemite Valley Plan. During public scoping for the Yosemite Lodge Area Redevelopment, public comment identified the presence of an American Indian traditional use area east of Yosemite Creek that would be affected by the proposed new bridge roadway approach. The National Park Service determined that additional study needed to be conducted to ascertain the significance of the traditional use area and is currently conducting a Valleywide traditional use study. The National Park Service will determine whether construction of a new bridge across Yosemite Creek is necessary as part of the traveler information and traffic management system planning effort.

Indian Cultural Center Compliance

American Indian consultation indicated that the National Park Service should prepare a separate environmental compliance document for the Indian Cultural Center and should not include this project in the Yosemite Lodge Area Redevelopment. The National Park Service decided to include the Indian Cultural Center with the Yosemite Lodge Area Redevelopment due to the geographic proximity of the projects and similarities in timing for project implementation.

Indian Cultural Center Location

The public suggested that the National Park Service construct the Indian Cultural Center at the current museum site in Yosemite Village. The proposed location for the Indian Cultural Center was based on the location of the last historically occupied American Indian village in Yosemite Valley, an area of traditional significance, as identified in the General Management Plan and consultation with American Indian groups.

Organization of this Environmental Assessment

The remainder of this environmental assessment includes the following chapters and appendices:

Chapter II, Alternatives, presents the project alternatives considered by the National Park Service for the Yosemite Lodge Area Redevelopment. A discussion of the environmentally preferable alternative is also presented. This chapter includes the No Action Alternative and alternatives considered but dismissed. Summary tables comparing the alternatives and environmental consequences of the alternatives are provided at the end of Chapter II.

Chapter III, Affected Environment, provides an overview of the affected environment and describes the existing condition of natural resources, cultural resources, and social resources in the Yosemite Lodge, Camp 4, and Indian Cultural Center areas.

Chapter IV, Environmental Consequences, presents an analysis of the potential environmental impacts of each alternative, including impacts analyzed in the Yosemite Valley Plan, impacts specific to actions that have slightly changed since completion of the Yosemite Valley Plan, and cumulative impacts. In addition, an analysis of potential impairment of park resources resulting from the alternatives is presented.

Chapter V, Merced Wild and Scenic River, evaluates the Yosemite Lodge Area Redevelopment project in the context of the seven management elements of the Merced River Plan.

Chapter VI, Consultation and Coordination, summarizes the process relied upon in preparing and reviewing this document. It also lists the government agencies and organizations that will receive this environmental assessment, as well as the list of preparers and reviewers.

Chapter VII, References, includes the bibliography, glossary of terms, and acronyms used in this environmental assessment.

Appendix A, Applicable Legislation and Policies, describes key regulations and policies that form the legal context for development of the Yosemite Lodge Area Redevelopment Environmental Assessment.

Appendix B, Tree Management, provides detailed information on the National Park Service's proposed tree management efforts.

Appendix C, Mitigation Measures Common to All Action Alternatives, identifies mitigation measures that have been incorporated into the action alternatives.

Appendix D, Special-status Species Evaluation, identifies all of the special-status species considered in development of this environmental assessment.

Appendix E, Environmental Consequences Methodologies, describes the methodologies used in analyzing environmental consequences of the alternatives.

Appendix F, Cumulative Projects, lists the cumulative projects considered in analyzing the cumulative effects of the alternatives.

Appendix G, Draft Floodplain and Wetland Statement of Findings, presents the draft floodplain and wetland statement of findings for the proposed action.